

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**MICHELLE BOURDELAIS,
on behalf of herself and behalf
of all others similarly situated,**

Plaintiff,

v.

Civil Action No. 3:10-cv-670

JPMORGAN CHASE BANK, NA,

and

CHASE HOME FINANCE, LLC,

Defendants.

**CONSENT MOTION TO AMEND THE COURT'S SCHEDULING
ORDER TO EXTEND THE DISCOVERY CUT-OFF AND THE
DEADLINE TO RAISE ANY DISCOVERY-RELATED ISSUES**

Defendants JPMorgan Chase Bank, N.A., and Chase Home Finance, LLC (collectively, "JPMorgan Chase"), by counsel, hereby moves this Court to amend the Scheduling Order entered on October 5, 2012 [Docket No. 57] to extend the discovery cut-off and the deadline to raise any discovery-related issues by three weeks each for the following reasons:

1. The trial date for this case is set for March 4, 2013. Per the Scheduling Order entered by the Court on October 5, 2012, the discovery cut-off is January 8, 2013 and the deadline to raise any discovery-related issue is December 28, 2012.

2. The parties continue to conduct discovery consistent with the Scheduling Order; however, they also are attempting to resolve the case.

3. Between the continuing efforts to resolve the case and the limitations due to the holiday schedule, additional time is needed to complete discovery.

4. The extension of the discovery deadline and the deadline to raise any discovery-related issues by three weeks will not affect the other deadlines in the Court's Scheduling Order, including the trial date currently scheduled for March 4, 2013.

5. Counsel for JPMorgan Chase has conferred with counsel for Plaintiff regarding this motion, and counsel for Plaintiff consents to this motion.

6. A proposed Agreed Order is being circulated for endorsement by counsel for Plaintiff and JPMorgan Chase, a copy of which is attached hereto as Exhibit 1.

WHEREFORE, Defendants, JPMorgan Chase Bank, N.A. and Chase Home Finance, LLC, by counsel, respectfully requests that the Court enter an Order: (1) granting their Consent Motion to Amend the Court's Scheduling Order to Extend the Discovery Cut-Off and the Deadline to Raise Discovery-Related Issues; (2) amending the Scheduling Order to extend the discovery cut-off to January 29, 2013 and the deadline for raising any discovery-related issues to January 24, 2013; and (3) awarding the parties such further relief as the Court deems appropriate.

**JPMORGAN CHASE BANK, N.A. and
CHASE HOME FINANCE, LLC**

By /s/David N. Anthony
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of December, 2012, I electronically filed the foregoing Consent Motion with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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